



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX

75 Hawthorne Street  
San Francisco, CA 94105

SEP 26 2006

Robert J. Gundrum  
Chief of Plant Operations II  
El Paso De Robles Youth Correctional Facility  
4545 Airport Road  
Paso Robles, CA 93446

Re: Violations of the Toxic Substances Control Act (TSCA)

Dear Mr. Gundrum:

I am in receipt of your letter dated September 8, 2006, sent in response to the Notice of Noncompliance (NON) issued on August 14, 2006. The purpose of the NON was to ensure El Paso De Robles Youth Correctional Facility's ("El Paso De Robles - YCF") compliance with the provisions of the Toxic Substances Control Act (TSCA), U.S.C. § 2601 et. seq., and the regulations regarding the storage of polychlorinated biphenyls (PCBs).

EPA appreciates the efforts of El Paso De Robles - YCF to ensure that PCBs are stored properly. We encourage you to regularly check the PCB websites at <http://www.epa.gov/pcb> and <http://www.epa.gov/region09/toxic/pcb> to remain up-to-date on PCB regulations.

At this time, EPA will not pursue further action relating to one-year storage. However, EPA does reserve the right to pursue further action if additional information about potential violations of El Paso De Robles - YCF becomes available.

Should you have any questions, you may contact Christopher Rollins at (415) 947-4166.

Sincerely,

A handwritten signature in black ink that reads "David R. Tomsovic" followed by a stylized "FR" or "FAR" monogram.

Paula Bisson, Manager  
Toxics Office  
Communities and Ecosystems Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

Robert J. Gundrum  
Chief of Plant Operations II  
El Paso De Robles Youth Correctional Facility  
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Sincerely,

Paula Bisson, Manager  
Toxics Office  
Communities and Ecosystems Division

MAIL CODE	CED-4	ced 4				
SURNAME	Rollins	DTG/PB				
DATE	9/21/06	9/22/06				

U.S. EPA CONCURRENCES

OFFICIAL FILE

# ROUTING AND TRANSFER

TO: (Name, office symbol, room number, building, agency/post) 9/21/06

1.	Paula Beson DT	9/22
2.	Elnora Kirk	
3.	Chris Rollins	
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

NON Closure Letter

- Facility corrected violation
- PCBs disposed of properly (Disposal Records Provided) ✓
- Facility will now provide training for workers and change procedures.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Chris Rollins	Phone No. 7-4166

5041-102

☆ U.S.G.P.O.: 1993 300-891/80018

OPTIONAL FORM 41 (Rev. 7-76)  
Prescribed by GSA  
FPMR (41 CFR) 101-11.206

**DIVISION OF JUVENILE JUSTICE**

**El Paso de Robles Youth Correctional Facility  
4545 Airport Rd.  
Paso Robles, CA 93446**



September 8, 2006

Christopher Rollins  
U.S. EPA, Region 9  
CED-4  
75 Hawthorne Street  
San Francisco, CA 94105

Re: Response to NON Sent Certified Mail # 7005-2570-0001-6437-2359

Dear Mr. Rollins,

This letter is in response to the notice of noncompliance that was issued to us from you and which we received on August 18, 2006.

I am providing you with copies of both the transformer disposal and PCB oil incineration certificates that you have requested.

We will be requesting training of our managers and supervisors through the California Department of Corrections and Rehabilitation's Office of Risk Management. The ORM administers the Hazardous Waste Program for CDCR. When we removed the transformers and waste PCB oil from onsite this was assumed to be following the intent of the law. In the future we will make sure that all PCB's be disposed of within one year after being placed into storage. Let me assure you that El Paso de Robles Youth Correctional Facility and myself are committed to follow all rules and regulations of the United States Environmental Protection Agency.

If you should require any additional information please contact me at (805) 227-2523 at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert J. Gundrum", is written over a horizontal line.

Robert J. Gundrum  
Chief of Plant Operations II

412  
CAP 07 981 707

BY:                     

### **Certificate of Receipt and Disposal of PCB Waste**

**Disposal Facility**

**US Ecology Inc.**  
**P.O. Box 578**  
**Beatty, NV. 89003**

EPA identification Number

**NVT330010000**

### Disposal Certification

**Generator Name:** EL PASO DE ROBLES YOUTH CORRECTIONAL FACILITY

I HEREBY CERTIFY THAT PCB WASTE MATERIAL LISTED ON MANIFEST NO: 21390288  
AND ANY ATTACHMENTS WAS:

[ X ] Received at the US Ecology, Inc., Beatty, Nevada facility on: 8/30/2002

[ ] Landfilled at the US Ecology, Inc., Beatty, Nevada facility on: \_\_\_\_\_

☐ Stored pending shipment for Off-Site Treatment/Incineration

[ X ] Shipped for incineration on Manifest # : 02037 incinerated on : 10/9/2002  
41 Gals. PCB Oil (drained from C-1 transformers)  
25 Gals. PCB Oil <50 ppm ( from M-1 trans.)

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and U.S.C. 2815), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direction, made the verification that this information is true, accurate and complete.

**For US Ecology Inc.**

Yvonne Wardwell  
Yvonne Wardwell

**Date:** 10/20/2002

**Certificate of Receipt and Disposal of PCB Waste****Disposal Facility**

**US Ecology Inc.  
P.O. Box 578  
Beatty, NV. 89003**

**EPA identification Number**

**NVT330010000**

**Disposal Certification**

**Generator Name: EL PASO DE ROBLES YOUTH CORRECTIONAL FACILITY**

**I HEREBY CERTIFY THAT PCB WASTE MATERIAL LISTED ON MANIFEST NO: 21390288  
AND ANY ATTACHMENTS WAS:**

☒ Received at the US Ecology, Inc., Beatty, Nevada facility on: 8/30/02

☒ Landfilled at the US Ecology, Inc., Beatty, Nevada facility on: 9/5/02

☒ Stored pending shipment for Off-Site Treatment/Incineration \* **SEE BELOW**

☐ Shipped for Incineration on Manifest No. : \_\_\_\_\_ and Incinerated on: \_\_\_\_\_

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direction, made the verification that this information is true, accurate and complete.

**\* PCB OIL**

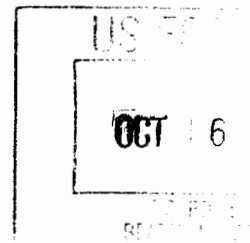
For US Ecology Inc. \_\_\_\_\_

  
Mark Henderson

Date: 9/11/02

**ONYX ENVIRONMENTAL SERVICES, L.L.C.**

Federal EPA ID: TXD000838896  
State EPA ID: 50212-001  
Highway 73  
Port Arthur, TX 77643  
(409) 736-2821



US ECOLOGY INC  
ATTN: MANIFEST SECTION  
NVT330010000  
HWY 95 11 MI SO OF BEATTY  
BEATTY, NV 89003-0578

CERTIFICATE OF DESTRUCTION

Onyx Environmental Services, L.L.C. has received waste material from US ECOLOGY INC on 9/20/02 as described on [State Manifest or Uniform] Hazardous Waste Manifest number 0002499656. Onyx Environmental Services, L.L.C., hereby certifies that the above described material was incinerated, and thereby destroyed, in accordance with the 40 CFR, part 761, as it pertains to the incineration of Poly-Chlorinated Biphenyl contaminated materials.

---

Sequence 1

Profile Number: CM2911  
Onyx Tracking ID: 563950

<u>Process</u>	<u>Onyx Unit ID</u>	<u>Treatment Date</u>	<u>Generator #</u>
INCINERATION	1	10/9/02	N/A

---

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

*Melvin Stallworth*

---

10-Oct-02

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. CAD981381767		Manifest Document 90288		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address EL PASO DE ROBLES YOUTH CORRECTIONAL FACILITY 4545 AIRPORT ROAD ATTN:ROLAND DESFOSES BASO ROBLES, CA 93447-7008 805-238-4040						A. State Manifest Document Number 21390288							
4. Generator's Phone						B. State Generator's ID							
5. Transporter 1 Company Name INDUSTRIAL WASTE UTILIZATION						C. State Transporter's ID [Reserved.]							
6. US EPA ID Number CAD980585293						D. Transporter's Phone 909-984-9984							
7. Transporter 2 Company Name						E. State Transporter's ID [Reserved.]							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address US ECOLOGY HWY 95 AT 11 Miles South of Beatty BEATTY NV 89003						G. State Facility's ID							
10. US EPA ID Number NYT330010000						H. Facility's Phone 775-553-2203							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No.		13. Total Quantity		14. Unit Wt/Vol		I. Waste Number	
a. RQ, Polychlorinated biphenyls, liquid 9 UN2315, II						002 CM		00300		K		State 261 EPA/Other None	
b. Non RCRA Hazardous Waste Liquid (Polychlorinated Biphenyls <5ppm),						001 CM		00150		K		State 261 EPA/Other None	
c.												State EPA/Other	
d.												State EPA/Other	
J. Additional Descriptions for Materials Listed Above (11a)-PCB Transformers with Oil, (11b)-PCB Transformer with <5ppm PCB Oil						K. Handling Codes for Wastes Listed Above a. 03/07/14 b. 03/07/14 c. d.							
15. Special Handling Instructions and Additional Information (11a)-Approval #070128916, Serial#9732500 & 9732501 Out of Service Date: October 2001 ERG#-171, (11b)-Approval #070128916-NR, EMERGENCY CONTACT: 8052384040 CONTAINER SIZE: 3'11" X 21" 11B 40" X 19"													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name JOSE F. DIAZ FOR DYA						Signature Jose F. Diaz				Month Day Year 08/20/02			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MIKE MC MANAMA						Signature Mike McManama				Month Day Year 08/20/02			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space 13.) Actual weights received 1127 K total @ TSDP - Qd 8/30/02.													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Tom Dymond													
Signature Tom Dymond						Month Day Year 08/30/02							

DO NOT WRITE BELOW THIS LINE.



**SENDER: COMPLETE THIS SECTION**

- Complete item 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Bob Gundrum - cpo II  
El Paso De Robles Youth  
Correctional Facility  
4545 Airport Road  
Paso Robles, CA 93446

## 2. Article Number

(Transfer from service label)

7005 2570 0001 6437 2359

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Print Clearly)

B. Date of Delivery

8-19-06

C. Signature

X [Signature]

☐ Agent☐ Addressee

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

## 3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

UNITED STATES POSTAL SERVICE

ONTARIO CLARITA

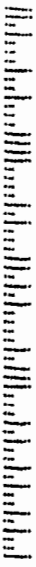
CA 913 11

First Class Mail  
Permit No. 6-10

• Sender: Please print your name, address, and ZIP+4 in this box.

Diana Bowen  
U.S. EPA, Region 9  
CED-4  
75 Hawthorne Street  
San Francisco, CA 94105

20 0004



## ROUTING J TRANSMITTAL SLIP

Date

8/1/06

TO: (Name, office symbol, room number, building, Agency/ Post)	Initials	Date
1. Diana Bowen	DB	8/9/06
2. Chris Rollins	CR	8/14/06
3. Paula Bisson	plb	
4. Elvira Kirk	EK	8/14/06
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

## REMARKS

Notice of Non compliance

- 2 transformers 1) less than 5ppm  
2) greater than 5ppm

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/ Post)	Room No. — Bldg.
Diana Bowen	Phone No. 74167

NSN 7540-00-935-5862  
5041-103



OPTIONAL FORM 41 (Rev. 1-94)  
Prescribed by GSA  
UNICOR FPI - SST

7005 2570 0001 6437 2359

Sent To	Bob Gundrum - CPO II
Street, Apt. No.	4545 Airport Road
City, State, ZIP+4	Paso Robles CA 93446
PS Form 3800, June 2002	
See Reverse for Instructions	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

AUG 14 2008

Notice of Noncompliance  
Certified Mail No.: 7005-2570-0001-6437-2359

Bob Gundrum - CPO II  
El Paso De Robles Youth Correctional Facility  
4545 Airport Road  
Paso Robles, CA 93446

Re: Notice of Noncompliance for Violations of the Toxic Substances Control Act

Dear Mr. Gundrum:

This letter is a Notice of Noncompliance ("NON") issued by the U.S. Environmental Protection Agency ("EPA") to the El Paso De Robles Youth Correctional Facility ("El Paso De Robles-YCF"), located in Paso Robles, CA. This NON is based on information in EPA's possession indicating that El Paso De Robles-YCF has violated the Toxic Substances Control Act ("TSCA"), U.S.C. § 2601 et. seq., and the regulations regarding storage of polychlorinated biphenyls ("PCBs") promulgated under TSCA at 40 C.F.R. part 761.

In accordance with 40 C.F.R. § 761.65(a)(1), PCBs shall be disposed of within 1 year from the date when they are first placed into storage. According to Manifest Number 90288, transformers containing PCB oils were taken out of service on October 1, 2001. While the transformers were drained and disposed of by US Ecology on September 5, 2002, the oil was not disposed of until October 9, 2002, more than a year after the out of service date.

Within thirty (30) days of receipt of this NON, please provide the EPA with evidence that El Paso De Robles-YCF has taken steps to address the violation(s) cited in this NON. Relevant information would include oil and transformer disposal records and what system, if any, El Paso De Robles-YCF has in place to assure that PCBs are disposed of within the one year time frame. This documentation should be submitted to:

Christopher Rollins  
U.S. EPA, Region 9  
CED- 4  
75 Hawthorne Street  
San Francisco, CA 94105

This NON is issued by the EPA in lieu of further action at this time. Within thirty (30) days of receipt of this NON, the requested documentation should be submitted to certify that El Paso De Robles-YCF has properly addressed the violation(s) cited in the NON. Failure to submit the requested documentation may cause the EPA to take further enforcement action as provided in TSCA, including possible imposition of civil penalties.


We would also like to extend to you the opportunity to advise the EPA of any information you believe that the EPA should consider with respect to this NON. Relevant information might include any exculpatory information, evidence of reliance on compliance assistance provided by the EPA or State agencies, or misidentification of the proper party.

Please be advised that you may assert a confidential business information ("CBI") claim covering any or all of the information that is submitted in response to this letter. Every CBI claim should be made in accordance with the criteria as listed in 40 C.F.R. § 2.208. If a CBI claim is not received accompanying the requested materials, they may be made available to the public without future notice.

Enclosed is a Small Business Regulatory Enforcement and Fairness Act ("SBREFA") Information Sheet, which is designed to provide information on compliance assistance and inform small businesses of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. Be aware that the SBREFA does not eliminate your responsibility to respond to this request for information within the allowed time nor does it create any new rights or defenses under the law.

If you have any questions, please contact Christopher Rollins at (415) 947-4166. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Paula Bisson".

Paula Bisson, Manager  
Toxics Office  
Communities and Ecosystems Division

Enclosure



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105**

Notice of Noncompliance

Certified Mail No.: 7005-2570-0001-6437-2359

Bob Gundrum - CPO II  
El Paso De Robles Youth Correctional Facility  
4545 Airport Road  
Paso Robles, CA 93446

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Christopher Rollins  
U.S. EPA, Region 9  
CED- 4  
75 Hawthorne Street  
San Francisco, CA 94105

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Sincerely,

Paula Bisson, Manager  
Toxics Office  
Communities and Ecosystems Division

Enclosure

MAIL CODE	CED-4	CED-4	CED-4			
SURNAME	Bowen	Rollins	Bisson			
DATE	8/14/06	8/14/06	8-14-06			

U.S. EPA CONCURRENCES

OFFICIAL FILE



24 25 R2 (R9)  
**ONYX ENVIRONMENTAL SERVICES**



**RECEIVED**

DEC 5 2002

Air/Toxics & Inspection  
Coordination Branch  
6EN-A

November 19, 2002

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**7001 0320 0005 1228 7905**

U.S. Environmental Protection Agency  
Attn: Jane Saginaw  
Region VI  
1445 Ross Avenue  
Dallas, TX 75202-2733

**RE: PCB One Year Exception Report.**  
**Chemical Waste Management, Inc. Port Arthur,**  
**Industrial & Solid Waste Registration No. 50212,**  
**TXD 000838896**

Dear Ms. Saginaw:

Onyx Environmental Services, L.L.C., Port Arthur Facility hereby submits the enclosed **PCB One Year Exception Report** as required by 40 CFR 761.215(c)(1-2) for waste disposed in the month of October 2002.

If you require any assistance in your review of these reports, please contact me at (409) 736-4122.

Sincerely,

ONYX ENVIRONMENTAL SERVICES, LLC.

Mona M. Rountree  
Environmental Compliance Supervisor

cc: Central Files (w/attachments)

**ONYX ENVIRONMENTAL SERVICES, L.L.C.**  
**PCB ONE YEAR EXCEPTION REPORT**  
**Waste Disposed in October 2002**

MANIFEST NUMBER	OSD	DATE RECEIVED	DATE TRANS RECEIVED	TRANSPORTER	BURNED DATE	DELAY
21604	11/17/2000	9/24/2002	9/23/02	TCI	10/13/2002	Receipt date greater than 9 months of OSD.
25632	10/3/2001	9/13/2002	9/12/02	TCI	10/6/2002	Receipt date greater than 9 months of OSD.
26508	1/11/2001	10/24/2002	10/23/02	0	10/28/2002	Receipt date greater than 9 months of OSD.
80107	11/3/2000	7/17/2002	7/12/02	RUAN TRANSPORT	10/16/2002	Receipt date greater than 9 months of OSD.
1985529	10/1/2001	1/30/2002	1/8/2002	HERITAGE/ONYX	10/15/2002	
2104447	3/20/2001	6/20/2002	6/19/2002	MIDWEST ENV TRANS	10/17/2002	Receipt date greater than 9 months of OSD.
2240593	8/9/2001	7/17/2002	7/16/2002	CLEAN HARBORS	10/14/2002	Receipt date greater than 9 months of OSD.
2354528	4/12/2001	8/1/2001	7/30/2001	DART	10/17/2002	
2420031	10/16/2001	12/4/2001	11/9/01-11/10/01	TRI-STATE/ONYX	10/17/2002	
2422599	8/20/2001	9/11/2002	9/10/2002	TRI-STATE	10/26/2002	Receipt date greater than 9 months of OSD.
2496238	9/27/2001	9/25/2002	9/24/02	ROBBIE D WOOD	10/16/2002	Receipt date greater than 9 months of OSD.
2496247	8/8/2001	10/28/2002	10/25/02	ROBBIE D WOOD	10/31/2002	Receipt date greater than 9 months of OSD.
2499656	10/1/2001	9/20/2002	9/17/02	TRIAD	10/9/2002	Receipt date greater than 9 months of OSD.
2634526	10/3/2001	10/25/2001	10/3/2001	BAY WEST/ONYX	10/15/2002	

**RECEIVE**

**DEC 5 2002**

**Air/Toxics & Inspection  
Coordination Branch  
6EN-A**

563950



<sup>H</sup> 2304 ENVIRONMENTAL  
H 112

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>NV T 33 001 0000 02037</b>		Manifest Document No. of <b>1</b>		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address <b>VS ECOLOGY, INC. P.O. BOX 578 BEATTY, NV. 89003</b>				A. State Manifest Document Number <b>02499656</b>					
4. Generator's Phone ( <b>775</b> ) <b>553-2203</b> (FOR EMERGENCY RESPONSE)				B. State Generator's ID <b>99932</b>					
5. Transporter 1 Company Name <b>TRIAO TRANSPORT, INC.</b>				6. US EPA ID Number <b>OKD 981588791</b>		C. State Transporter's ID <b>41038</b>		D. Transporter's Phone (800) <b>364-9233</b>	
7. Transporter 2 Company Name				8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address <b>ONYX ENVIRONMENTAL SERVICES, L.L.C. HIGHWAY 73, 3.5 MILES WEST OF TAYLORS BAYOU PORT AUTHORITY, TX. 77640</b>				10. US EPA ID Number <b>TX 0000838896</b>		G. State Facility's ID <b>50212</b>		H. Facility's Phone <b>(409) 736-2821</b>	
11A. HM		11. US DOT Description (including Proper Shipping Name, Hazard Class, ID Number and Packing Group)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol	
		a. <b>RQ POLYCHLORINATED BIPHENYLS (SOLUTION), 9, UN 2315, PG III, MARINE POLLUTANT</b>		<b>001 TT</b>		<b>16918</b>		<b>K</b>	
		b.							
		c.							
		d.							
J. Additional Descriptions for Materials Listed Above <b>11A.) PROFILE: CM2911 PCB OIL &amp; FLUSH ERG 172 P.O.# B004509</b>				K. Handling Codes for Wastes Listed Above <b>M041 SR# 557061</b>					
15. Special Handling Instructions and Additional Information <b>GENERATOR LOCATION: HWY 95, 11 MILES SOUTH OF BEATTY, NV. 89003 SEE ATTACHMENTS TO MANIFESTS FOR SOURCE GENERATORS AND OUT OF SERVICE DATES.</b>									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labelled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name <b>MARK HENDERSON</b>				Signature <i>Mark Henderson</i>				Month Day Year <b>09/17/02</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name <b>ROBERT BRINGIT</b>				Signature <i>Robert Bringit</i>				Month Day Year <b>08/17/02</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name				Signature				Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name <b>Martha Williams</b>				Signature <i>Martha Williams</i>				Month Day Year <b>10/17/02</b>	

## US Ecology, Inc.

Manifest Number 02037

PROFILE NUMBER	UNIQUE I.D.NO.	SOURCE GENERATOR NAME	DATE REMOVED FROM SERVICE FOR DISPOSAL	PCB CATEGORY	VOLUME		WEIGHT		ADDITIONAL INFORMATION
					GALLONS	CU. FT.	POUNDS	TANK	
CM2911		KENTUCKY UTILITIES	6/17/02		5			TANK A	02061701602
CM2911		CALLAWAY ELECTRIC	6/17/02		5			TANK A	02061701602
CM2911		KERN VALLEY SCHOOL	6/12/02		404			TANK A	02061801609
CM2911		KERN VALLEY SCHOOL	6/18/02		424			TANK A	02061801609
CM2911		KERN VALLEY SCHOOL	6/12/02		14			TANK A	02061801609
CM2911		KERN VALLEY SCHOOL	6/12/02		80			TANK A	02061801609
CM2911		KERN VALLEY SCHOOL	6/12/02		1			TANK A	02061801609
CM2911		SHAFTER HIGH SCHOOL	6/14/02		227			TANK A	02061801609
CM2911		SHAFTER HIGH SCHOOL	6/14/02		79			TANK A	02061801609
CM2911		NAVAL AIR STATION, NORTH ISLAND	3/5/02		406			TANK A	020513012
CM2911		ILLINOIS POWER COMPANY	6/20/02		390			TANK A	02071001823
CM2911		ILLINOIS POWER COMPANY	6/20/02		20			TANK A	02071001823
CM2911		ROSEBERG FOREST PRODUCTS	6/11/02		1801			TANK B	02040100836
CM2911		SHELL OIL PRODUCTS	NA		36			TANK B	02062701724
CM2911		SOLOMON CORP	5/12/02		136			TANK B	02060401480
CM2911		BUREAU OF LAND MANAGEMENT	NA		127			TANK B	02062801734
CM2911		BUREAU OF LAND MANAGEMENT	NA		12			TANK B	02062801734
CM2911		SHELL OIL PRODUCTS	NA		36			TANK B	02062701724
CM2911		GRAHAM COUNTY UTILITIES	8/1/02		3			TANK B	02081502217
CM2911		GRAHAM COUNTY UTILITIES	8/1/02		32			TANK B	02081502217
CM2911		PACIFIC GAS & ELECTRIC	6/6/02		70			TANK C	02061101530
CM2911		MIDAMERICAN - SIOUX CITY	5/5/02		15			TANK C	02070801797
CM2911		MIDAMERICAN - SIOUX CITY	7/9/02		18			TANK C	02070801797
CM2911		MIDAMERICAN - SIOUX CITY	5/5/02		71			TANK C	02070801797
CM2911	EL PASO DE ROBLES YOUTH CORRECTIONAL		10/1/01		41			TANK C	020830024
CM2911	EL PASO DE ROBLES YOUTH CORRECTIONAL		10/1/01		25			TANK C	0208300240
CM2911		NAVY PUBLIC WORKS CODE 931	3/27/02		32			TANK C	02090602469
CM2911		PACIFIC GAS & ELECTRIC	8/2/02		148			TANK D	02060401485
CM2911		PORT OF CORPUS CHRISTI	8/2/02		6			TANK D	02060401486
CM2911		SOUTHWEST MARINE / TERMINAL ISLA	4/1/02		852			TANK D	02090302422

21390288  
IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded area is not required by Federal law
3. Generator's Name and Mailing Address EL PASO DE ROBLES YOUTH CORRECTIONAL FACILITY 4545 AIRPORT ROAD ATTN: ROLAND DESFOSES BASO ROBLES, CA 93447-7008 (805-238-4040)		CAD981381767	90288	A. State Manifest Document Number 213902	
4. Generator's Phone		6. US EPA ID Number	C. State Transporter's ID (Reserved)	D. Transporter's Phone	
5. Transporter 1 Company Name INDUSTRIAL WASTE UTILIZATION		CAD980585293	E. State Transporter's ID (Reserved)	F. Transporter's Phone	
7. Transporter 2 Company Name		8. US EPA ID Number	G. State Facility's ID	H. Facility's Phone	
9. Designated Facility Name and Site Address US ECOLOGY HWY 95 AT 11 Miles South of Beatty BEATTY NV 89003		10. US EPA ID Number NYT330010000	775-553-2203		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	15. Waste Number
a. RQ, Polychlorinated biphenyls, liquid UN2315, II		002 CM	00300	K	State 261 EPA/Other None
b. Non RCRA Hazardous Waste Liquid (Polychlorinated Biphenyls <5ppm),		001 CM	00150	K	State 261 EPA/Other None
c.					State EPA/Other
d.					State EPA/Other
J. Additional Descriptions for Materials Listed Above (11a)-PCB Transformers with Oil, (11b)-PCB Transformer with <5ppm PCB Oil		K. Handling Codes for Wastes Listed Above a. 03/07/14 b. 03/07/14 c. d.			
15. Special Handling Instructions and Additional Information (11a)-Approval #070128916, Serial#9732500 & 9732501 Out of Service Date: October 2001 ERG#-171, (11b)-Approval #070128916-NR, EMERGENCY CONTACT: 805-238-4040 CONTAINER SIZE: 11A 3'11" x 21" 11B 40"					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name JOSE F. DIAZ FOR DYA		Signature Jose F. Diaz		Month Day 08 20 02	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MINE MC MANAMA		Signature M. McManama		Month Day 08 20 02	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day	
19. Discrepancy Indication Space 13.) Actual weights received 1127 K total @ TSDP - Oct 8/30/02.					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Tom Dymond					
Signature Tom Dymond		Month Day 08 30 02			

DO NOT WRITE BELOW THIS LINE.

21390288  
IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CAD981381767	Manifest Document No. 90288	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address EL PASO DE ROBLES YOUTH CORRECTIONAL FACILITY 4545 AIRPORT ROAD ATTN:ROLAND DESFOSES PASO ROBLES, CA 93447-7008 805-238-4040			A. State Manifest Document Number 2139028		
4. Generator's Phone			B. State Generator's ID		
5. Transporter 1 Company Name INDUSTRIAL WASTE UTILIZATION			C. State Transporter's ID [Reserved]		
6. US EPA ID Number CAD980585293			D. Transporter's Phone 909-984-9984		
7. Transporter 2 Company Name			E. State Transporter's ID [Reserved]		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address US ECOLOGY HWY 95 AT 11 Miles South of Beatty BEATTY NV 89093			G. State Facility's ID		
10. US EPA ID Number NVT330010000			H. Facility's Phone 775-553-2203		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. RQ, Polychlorinated biphenyls, liquid 9 UN2315, II		002 DM	00300	K	State 261 EPA/Other None
b. Non RCRA Hazardous Waste Liquid (Polychlorinated Biphenyls <5ppm),		001 DM	00150	K	State 261 EPA/Other None
c.					State EPA/Other
d.					State EPA/Other
J. Additional Descriptions for Materials Listed Above (11a)-PCB Transformers with Oil, (11b)-PCB Transformer with <5ppm PCB Oil			K. Handling Codes for Wastes Listed Above a. b. c. d.		
15. Special Handling Instructions and Additional Information (11a)-Approval #070128916, Serial#9732500 & 9732501 Out of Service Date: October 2001 ERG#-171, (11b)-Approval #070128916-NR, EMERGENCY CONTACT: 8052384040 CONTAINER SIZE: 3'11" X 21" 118 40" X 1					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name JOSE F. DIAZ FOR DYA		Signature Jose F. Diaz		Month Day Year 09 20 02	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name MIRIAM MANAMA		Signature Miriam Manama		Month Day Year 09 20 02	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year					

DO NOT WRITE BELOW THIS LINE.

CAD 93 34 4E

State of California

Department of Corrections & Rehabilitation  
Division of Juvenile Justice  
El Paso de Robles Youth Correctional Facility  
P.O. Box 7008  
Paso Robles, California 93447-7008



# FAX

TO: Diana Bowen	FROM: Bob Gundrum, CPO II
PHONE: 1-415-947-4167	PHONE: 1-805-227-2523
FAX: 1-415-947-3583	FAX: 1-805-227-2568
Re: Manifest #21390288	DATE: July 21, 2006
PAGES: 2 including cover	E-MAIL: bgundrum@cya.ca.gov

☐ Urgent    ☐ For Review    ☐ Please Comment    ☐ Please Reply    ☒ Your Use

• Comments:

Hi DIANA,

I'VE ATTACHED CERTIFICATE OF RECEIPT AND  
DISPOSAL OF PCB WASTE. IF YOU NEED  
ANYTHING ELSE PLEASE LET ME KNOW

A handwritten signature, likely of Bob Gundrum, is located at the bottom center of the page. It is written in a cursive, stylized font.

# US Ecology

an American Ecology company

775-553-2203

Fax 775-553-2742

## Certificate of Receipt and Disposal of PCB Waste

### Disposal Facility

US Ecology Inc.  
P.O. Box 578  
Beatty, NV. 89003

### EPA identification Number

NVT330010000

### Disposal Certification

Generator Name: EL PASO DE ROBLES YOUTH CORRECTIONAL FACILITY

I HEREBY CERTIFY THAT PCB WASTE MATERIAL LISTED ON MANIFEST NO: 21390288  
AND ANY ATTACHMENTS WAS:

☒ Received at the US Ecology, Inc., Beatty, Nevada facility on: 8/30/02

☒ Landfilled at the US Ecology, Inc., Beatty, Nevada facility on: 9/5/02

☒ Stored pending shipment for Off-Site Treatment/Incineration \* SEE BELOW

☐ Shipped for Incineration on Manifest No. : \_\_\_\_\_ and Incinerated on: \_\_\_\_\_

Under civil and criminal penalties of law for making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and U.S.C. 2815), I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direction, made the verification that this information is true, accurate and complete.

\* PCB OIL

For US Ecology Inc.



Mark Henderson

Date: 9/11/02



CAL 921 391 7.7  
98

## Review Sheet: *El Paso De Robles - YCF*

### General Information

FY of Inspection: unknown

Date of Inspection:

Name (Facility, Violator,  
School, TCP):

El Paso De Robles - YCF

Type:

Tip/Complaint

Program:

PCB

Site Street Address:

4545 Airport Road

City:

Paso Robles

State: Zip:

CA 93446

County/District:

Contact Name:

Bob Gundrum

Contact Phone:

Fax Number:

Subprogram:

Inspection Number (PCBs):

Inspector:

Inspector Number:

Inspection Sequence:

Region/State:

Investigation Reason Code: Investigation Type:

SIC Code:

Federal Facility:

☐ Yes ☐ No

Self Disclosure:

☐ Yes ☐ No

Date of Self Disclosure:

Facility Type:

Federal Action:

NON

### Parent Company Information

ICDS Data (on-site inspections)

Compliance Assistance (on-site inspections)

Compliance Assistance Module Data - (not an inspection)

PCB

Lead Tips and Complaints

Archive Information

### Case Review & Development

#### CASE REVIEW:

Date Review Started:

Date Review Completed:

Action Warranted:

☒ Yes ☐ No

#### CASE DEVELOPMENT:

Case Developer: Diana Bowen	Violation Codes:	Case Number: 06T081401PCB
IRL Issued Date:	IRL Closed Date:	IRL Reason:
FY NON Issued: 2006	NON Issued Date: 08/14/2006	NON Closed Date: 09/21/2006
NON Followup Date: 09/09/2006		Followup date is calculated by adding 30 days to the current date. This date can be changed.
Attorney:	Date Referred to ORC:	Docket Number:
CC Date:	CAFO Date:	Date CC/CAFO Issued:
FY CC Filed: unknown	FY CAFO Signed: unknown	FY CC/CAFO Issued: unknown
Sep: <input type="radio"/> Yes <input checked="" type="radio"/> No	Proposed Penalty:	Settlement Amount:

## Notes

This NON is being issued based on an exception report submitted by Onyx in R6. The Exception report is dated 11/19/02 and the violation is in regards to 1 year storage violation. Two transformers < 5 ppm and > 500 ppm were taken out of Service on 10/1/01 and not shipped for disposal until 9/5/02. However, the oil was not disposed of until 1 year after the PCBs was taken out of service. A NON will be issued and EPA will request documentation related to the disposal of the oil, whether additional PCBs are present and if so what are their PCB concentrations. The NON was issued on August 14, 2006. The Response to the NON was received on 9/12/06. The facility provided all Certificates of Disposal/Destruction for the transformer and the oil. They also say they will get more training for their employees for the future. As such, this case is considered closed and I will close out this non in TED and FTTS.

## CLOSEOUT INFORMATION:

Date We Signed:	Letter Type: NON Closeout Letter	Date Letter Sent: 9/22/06
Date Penalty Rec'd by Treasury:	Date Terms/Conditions met:	Status: <input type="radio"/> Open <input checked="" type="radio"/> Closed

Date Closed: 09/22/2006

## EL PASO DE ROBLES

PCB transformers  
w/ out PCB  
transformers

< 5ppm PCB oil

\* transformers w/ PCB oil \*

- OSD - 10/1/01
- trans. rcv'd - 8/20/02
- USE rcv'd - 8/30/02

↳ transformer CD from USE 9/5/02

PCB oil sent off site

- ONXX rcv'd oul - 9/20/02
- ONYX burned - 10/9/02

Received 9/12/06